

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION

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In Re:

BIERCA NATALIA RAMOS
a/k/a BIERCA URENA-RAMOS
a/k/a NATALIE RAMOS

Chapter 7
Case No. 12-35795 (CGM)

Debtor(s)

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**AFFIDAVIT IN SUPPORT OF MOTION
TO RE-OPEN CASE, PURSUANT TO 11 U.S.C. §350 (b) and FRBP RULE 5010**

BIERCA URENA-RAMOS, being duly sworn, deposes and says:

1. That I am the debtor in the instant case and submit this Affidavit in support of my motion to re-open my bankruptcy case. The allegations set forth herein are based upon my actual knowledge.

2. When my bankruptcy was filed in 2012 I was recently separated from my husband and moving from place to place, and my life was very unsettled at said time. I was overwhelmed by my unwanted circumstances at that time, and when disclosing my assets on my bankruptcy petition I did not even think of the personal injury claim that arose from a "slip and fall" that had occurred over five (5) years prior thereto. I was under the mistaken belief that an asset, for bankruptcy purposes, had to be something tangible, i.e., that I already had in my hand. I did not realize that an inchoate claim, such as a personal injury claim, had to be listed as well. My failure to list said asset was based solely upon an inadvertent and innocent misunderstanding on my part, as above described. There was no intent on my part to intentionally hide this asset from my bankruptcy estate.

3. That your deponent requests that the Court re-open the bankruptcy case and appoint a new Trustee so that the personal injury case can be administered.

/s/ Bierca Urena-Ramos
BIERCA URENA-RAMOS

Sworn to before me this
3rd day of June, 2017

/s/ Michael O'Leary
MICHAEL O'LEARY
Notary Public, State of New York
No. 4671514
Qualified in Orange County
My Commission Expires June 30, 2018